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**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEVADA**

SECURITIES AND EXCHANGE  
COMMISSION,

Plaintiff,

vs.

HEMP, INC. a Colorado Corporation;  
BRUCE J. PERLOWIN, an individual;  
BARRY K. EPLING, an individual; JED  
M. PERLOWIN, an individual; FERRIS  
HOLDING, INC., a private Nevada  
Corporation; HOBBS EQUITIES INC.,  
a private Nevada Corporation;  
DIVERSIFIED INVESTMENTS LLC, a  
private Nevada Limited Liability  
Company; and QUANTUM ECONOMIC  
PROTOCOLS LLC, a private Nevada  
Limited Liability Company.

Defendants.

Case No.: 2:16-cv-1413

**PLAINTIFF'S UNOPPOSED MOTION FOR  
LEAVE TO ISSUE A RULE 45 SUBPOENA TO  
THE INTERNAL REVENUE SERVICE**

Pursuant to Local Rule 6-2, Plaintiff Securities and Exchange Commission (the  
“Commission”) submits this unopposed motion seeking leave of Court to issue a Rule 45  
Subpoena to Produce Documents to the Internal Revenue Service. Due to the expiration of the  
fact discovery period on July 17, 2017 (Docket No. 62), the Commission seeks leave of Court to

1 issue a subpoena outside the discovery period.

2 An evidentiary hearing is scheduled in this case on May 10, 2018. The Commission  
3 intends to offer relevant tax documents at the hearing. The tax documents were originally  
4 produced by the Internal Revenue Service (the "IRS") to the Commission after the close of  
5 discovery in this case. The Commission has requested the IRS to provide a Rule 902(1) records  
6 certification for those documents. However, the IRS has informed counsel for the Commission  
7 that it requires a subpoena in order to provide that certification. As a non-party, the IRS will not  
8 be prejudiced by the issuance of a subpoena outside the discovery period which seeks only a  
9 records certification of tax records previously produced.  
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12 Counsel for the Commission contacted counsel for Defendants Hemp, Inc., Bruce J.  
13 Perlowin, Barry K. Epling, Ferris Holding, Inc., and Hobbes Equities, Inc. regarding this motion  
14 for leave to issue subpoena. Counsel indicated that they do not oppose the relief requested in this  
15 motion.  
16

17 DATED this 20th day of March, 2018.

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21 \_\_\_\_\_  
22 Amy J. Oliver  
23 Daniel J. Wadley  
24 James J. Thibodeau  
25 Securities and Exchange Commission

26 **IT IS SO ORDERED.**

27 \_\_\_\_\_  
28 HONORABLE PEGGY A. LEEN  
UNITED STATES MAGISTRATE JUDGE

DATED: \_\_\_\_\_

**CERTIFICATE OF SERVICE**

I hereby certify that on the 20th day of March, 2018, I served **PLAINTIFF'S UNOPPOSED MOTION FOR LEAVE TO ISSUE A RULE 45 SUBPOENA TO THE INTERNAL REVENUE SERVICE** to the following parties entitled to service by via email to the counsel indicated below:

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